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VIA E-FILING AND E-MAIL
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May 6, 2016

Hon. Cathy Seibel
United States District Court for the Southern District of New York
Hon. Charles L. Brieant United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

RE: The Wave Studio, LLC v. General Hotel Management Ltd., et al.
Case No. 7:13-cv-09239-CS-PED

Dear Judge Seibel:

This firm is counsel for Plaintiff The Wave Studio, LLC (“Wave.”) Wave’s Cross-Motion for Summary Judgment (“Wave’s Motion”) is being filed via ECF concurrently with this letter. In accordance with Your Honor’s preferences, Wave’s cross-motion papers—along with Defendant’s opposition and Motion for Summary Judgment papers—have been bundled and are all being filed electronically today.

We write in accordance with Your Honor’s Rules of Individual Practice to request oral argument of Wave’s Cross-Motion. Wave agrees with Defendant that the facts of this case and the legal arguments in Wave’s Cross Motion, like Defendant’s Motion, are complex.¹ Because specific facts and legal arguments (including but not limited to issues of Singapore law and choice of law) may need further clarification and analysis that counsel can more easily and effectively provide at oral argument, we respectfully submit that oral argument will be beneficial for the Court as it renders a decision.

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¹ Wave disputes, however, Defendant’s contention, raised in its own letter to the court dated today requesting oral argument as to its Motion, that the issues are “even more complicated by additional legal and factual theories set forth for the first time” in Wave’s papers.

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Please contact us should you require any additional information. Thank you.

Respectfully submitted,

COBALT LLP

A handwritten signature in blue ink, appearing to read "Vijay Toke", with a long horizontal flourish extending to the right.

Vijay K. Toke